

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

FILED

2014 JAN 10 A 11:22

CIVIL ACTION NO:

U.S. DISTRICT COURT  
DISTRICT OF RHODE ISLAND

RICHMOND MOTOR SALES, INC.,  
and LISA ROBERTSON  
*Plaintiffs*

vs.

PROGRESSIVE CASUALTY  
INSURANCE COMPANY a/k/a THE  
PROGRESSIVE CORPORATION  
*Defendant*

CA 14 - 18 M

**NOTICE OF REMOVAL OF DEFENDANT,  
PROGRESSIVE CASUALTY INSURANCE COMPANY.**

TO THE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF  
RHODE ISLAND:

The petition of the Defendant, Progressive Casualty Insurance Company, by its attorneys,  
Boyle, Shaughnessy & Campo, P.C., for removal of this action from the Providence Superior Court of  
the State of Rhode Island, Providence County, Rhode Island, to the United States District Court for the  
District of Rhode Island, respectfully shows:

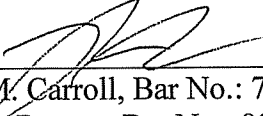
1. There was commenced, and is now pending in the Providence County Superior Court, a certain  
civil action in which the above named is plaintiff, and Progressive Casualty Insurance  
Company, an Ohio corporation, is the defendant. (See Plaintiffs' Amended Complaint, as well  
as Defendant's Answer to the Amended Complaint in that action attached hereto as **Exhibit 1**.)  
Said action bears Civil Action No.: 2013-5406.
2. Said action is of a civil nature, and the amount claimed by the plaintiff, exclusive of interest  
and costs, exceeds the sum of seventy-five thousand dollars (\$75,000), to-wit: an action to

recover damages for the loss of use of an automobile, compensatory damages, punitive damages, attorneys' fees, and further relief the court may deem fair just and equitable.

3. The action involves a controversy between citizens of different states.
4. The plaintiff, Richmond Motor Sales, Inc., is now, and was at the commencement of this action, a Rhode Island Domestic Profit Corporation with a principle office located at 700 North Main Street, Providence, Rhode Island.
5. The plaintiff, Lisa Robertson, is now, and was at the commencement of this action, a Rhode Island Resident with an address of 87 Potter Street, Cranston, Rhode Island.
6. The Defendant, Progressive Casualty Insurance Company, is now, and was at the commencement of this action, a corporation duly created and organized by and under the laws of the State of Ohio.
7. Said action is one of which the District Court of the United States is given original jurisdiction.
8. This notice is filed in this Court within 30 days after the receipt by the defendant of a copy of the initial pleadings setting forth the claim for relief upon which the action is based and the time for filing this notice under the Statute of the United States has not expired.
9. Written notice of the filing of this notice will be given to all adverse parties as required by law.
10. A true and correct copy of this notice will be filed with the Clerk of the Providence County Superior Court, as provided by law.

THE DEFENDANT,  
PROGRESSIVE CASUALTY  
INSURANCE COMPANY  
BY THEIR ATTORNEYS,

Date: 1/10/14




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Scott M. Carroll, Bar No.: 7624  
John D. Bowen, Bar No.: 9070  
Boyle, Shaughnessy & Campo, P.C.  
One Turks Head Place, Suite 1330  
Providence, RI 02903  
(401) 270-7676 *telephone*  
(401) 454-4005 *facsimile*

**CERTIFICATION**

I hereby certify that on this 10 day of January, 2014, a true copy of the foregoing was served first-class postage prepaid on all parties or their representatives in this action as listed below:

John O. Mancini, Esq.  
Nicholas J. Goodier, Esq.  
Law Officers of Michael A. Kelly, P. C.  
128 Dorrance Street, Suite 300  
Providence, RI 02903

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Scott M. Carroll, Bar No.: 7624  
John D. Bowen, Bar No.: 9070